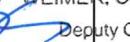


Case 1:25-cv-03797-ELR

Document 16

Page 1 of 4
Filed 10/31/25FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

NOV 03 2025

KEVIN P. WEIMER, Clerk
By:  Deputy ClerkIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

PAGE INJURY LAW, LLC,

Plaintiff,

vs.

YAN GOLDSHTEYN,

Defendant

Civ. No. 1:25-cv-03797-ELR

MOTION TO
REQUEST CM/ECF FILING RIGHTS
FOR PRO SE DEFENDANT**DEFENDANT'S YAN GOLDSHTEYN MOTION TO
REQUEST CM/ECF FILING RIGHTS FOR PRO SE DEFENDANT**

Defendant Yan Goldshteyn respectfully moves this Court for permission to file documents electronically via the Court's CM/ECF system.

Defendant, a duly licensed attorney, is currently proceeding pro se and does not have access to counsel admitted in the Northern District of Georgia. As demonstrated, Defendant has reliable access to a computer and internet connection

DEFENDANT'S REPLY IN SUPPORT OF MOTION TO STAY

Case 1:25-cv-03797-ELR

Document 16

Page 2 of 4
Filed 10/31/25

1
2 and is capable of complying with CM/ECF procedures, including formatting,
3
4 uploading, and serving documents electronically.

5 Granting CM/ECF access will facilitate timely filings, reduce
6 administrative burden, and promote judicial efficiency.
7
8
9

10 WHEREFORE, Defendant respectfully requests that the Court grant this motion
11 and permit electronic filing access via CM/ECF.
12
13
14
15

16 Respectfully submitted this 31st day of October, 2025.
17
18

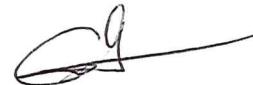


19
20 Yan Goldshteyn
21 Principal Attorney
22 Spartan Law Corp
23 427 N Canon Drive, Suite 212
24 Beverly Hills, CA. 90210
25 Telephone: 323-450-7000
yan@spartanlawcorp.com
Defendant

26
27
28 DEFENDANT'S REPLY IN SUPPORT OF MOTION TO STAY

Case 1:25-cv-03797-ELR

Document 16

Page 3 of 4
Filed 10/31/251
2
Certificate of Compliance
34
5
6
7
The undersigned counsel certifies that the foregoing has been
prepared in Times New Roman (14 point) font, as required by the Court in
Local Rule 5.1(B).8
Respectfully submitted on October 31, 2025.
910

1112
Yan Goldshteyn
13 Principal Attorney
14 Spartan Law Corp
15 427 N Canon Drive, Suite 212
16 Beverly Hills, CA. 90210
17 Telephone: 323-450-7000
yan@spartanlawcorp.com
Defendant
18
19
20
21
22
23
24
25
26
27
28

Case 1:25-cv-03797-ELR

Document 16

Page 4 of 4
Filed 10/31/25

1

2

CERTIFICATE OF SERVICE

3

4

5 **I HEREBY CERTIFY** that on this 1st day of November 2025, a copy of
6 the foregoing Defendant's Reply in Support of Motion to Stay was filed via mail
7 and served via first class mail to:

8

9

BEKIARES ELIEZER, LLP
Attention: Kennington R. Groff
Melanie K. Lane
Zachary C. Eyster
2870 Peachtree Rd. #512
Atlanta GA 30305

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Respectfully Submitted,



Yan Goldshteyn
Principal Attorney
Spartan Law Corp
427 N Canon Drive, Suite 212
Beverly Hills, CA. 90210
Telephone: 323-450-7000
yan@spartanlawcorp.com
Defendant

DEFENDANT'S REPLY IN SUPPORT OF MOTION TO STAY